

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

**LULAC TEXAS; VOTO LATINO; TEXAS** §  
**ALLIANCE FOR RETIRED** §  
**AMERICANS; TEXAS AFT,** §  
*Plaintiffs,* §

**v.** §

**JOSE ESPARZA, in his official capacity as** §  
**the Texas Deputy Secretary of State; KEN** §  
**PAXTON, in his official capacity as the** §  
**Texas Attorney General; JACQUELYN** §  
**CALLANEN, in her official capacity as the** §  
**Bexar County Elections Administrator;** §  
**DANA DEBEAUVOIR, in her official** §  
**capacity as the Travis County Clerk;** §  
**ISABEL LONGORIA, in her official** §  
**capacity as the Harris County Elections** §  
**Administrator; YVONNE RAMON, in her** §  
**official capacity as the Hidalgo County** §  
**Elections Administrator; MICHAEL** §  
**SCARPELLO, in his official capacity as the** §  
**Dallas County Elections Administrator;** §  
**LISA WISE, in her official capacity as the El** §  
**Paso County Elections Administrator;** §  
*Defendants.* §

**CIVIL ACTION NO. 1:21-CV-786**

**MOTION TO SET DEADLINE FOR RESPONSIVE PLEADING**

TO THE HONORABLE JUDGE XAVIER RODRIGUEZ:

Defendant ISABEL LONGORIA, in her official capacity as Harris County Elections Administrator, files this Unopposed Motion to Set Deadline for Responsive Pleading to the Original Complaint filed by TEXAS ALLIANCE FOR RETIRED AMERICANS, VOTO LATINO, LULAC TEXAS, and TEXAS AFT on September 7, 2021. The requested extension will allow Defendant up to and including October 25, 2021 to file her answer or other responsive pleading.

Pursuant to Local Rule CV-7(i), Defendant's counsel has conferred with Plaintiffs' counsel regarding the relief sought in this motion. Plaintiffs' counsel indicated that Plaintiffs do not oppose the motion.

This extension is for good cause and in the interests of judicial efficiency. Defendant requires time to become knowledgeable about the case and prepare an initial pleading. The requested relief is not sought for purposes of delay, but with good cause and so that justice may be done. Accordingly, Defendant ISABEL LONGORIA, in her official capacity as Harris County Elections Administrator respectfully requests an extension of time to answer or otherwise plead until and including October 25, 2021.

**September 28, 2021**

Respectfully submitted,

CHRISTIAN D. MENEFEE  
HARRIS COUNTY ATTORNEY

JONATHAN G. C. FOMBONNE  
FIRST ASSISTANT COUNTY ATTORNEY

TIFFANY S. BINGHAM  
MANAGING ATTORNEY, AFFIRMATIVE  
LITIGATION

/s/ Sameer Birring  
Sameer S. Birring  
Assistant County Attorney  
State Bar No. 24087169  
1019 Congress, 15th Floor  
Houston, Texas 77002  
[Sameer.Birring@cao.hctx.net](mailto:Sameer.Birring@cao.hctx.net)  
Tel: (713) 274-5142  
Fax: (713) 755-8924

**ATTORNEYS FOR DEFENDANT  
ISABEL LONGORIA, IN HER OFFICIAL  
CAPACITY AS THE HARRIS COUNTY  
ELECTIONS ADMINISTRATOR**

**CERTIFICATE OF CONFERENCE**

On September 27, 2021, counsel for ISABEL LONGORIA conferred by email with counsel for Plaintiffs and confirmed there is no objection to the requested relief.

/s/ Sameer Birring  
Sameer Birring

**CERTIFICATE OF SERVICE**

I certify that on the 28<sup>th</sup> day of September, 2021, I electronically filed this document with the clerk of court using the CM/ECF system, which will send notification of such filing to all counsel of record.

/s/ Sameer Birring  
Sameer Birring